

A review of age and school bus driving

This report has been prepared on foot of a request from the RSA to the National Office for Traffic Medicine for a review of factors relevant to medical fitness to drive and school bus operators, and in particular relating to age.

Worldwide, the criteria of medical fitness to drive for truck and bus drivers (Group 2) are in general more stringent than those for car and motorbike drivers (Group 1), given the increased risk arising from many factors, including the increased weight of the vehicle, the potential for hazardous material being transported, and the multiple numbers of occupants likely to be in buses and public service vehicles. This is paralleled in aviation, whereby standards for a commercial pilot's licence are significantly more stringent and restricted than for a private pilot's licence, restricting commercial pilot licences at 65 in both Europe and the USA.

This differential has been recognised by the European Union in its directives specifying more stringent review and overview of truck and bus drivers, including medical conditions and age across the lifespan. For example, a Group 2 licence cannot be granted before the age of 21 for categories D1 (no more than 16 passengers and not longer than 8 metres) and 24 years for category D (greater than 8 passengers). Medical certification is more regular in frequency during the driving life for Group 2 compared to Group 1, with yearly medical certification after the age of 65, criteria for a range of medical conditions which are significantly more restrictive than for Group 1, and specific rather than generalist specialist certification required for some conditions in recognition of increasing morbidity and multi-morbidity with advancing age.

In addition, there is significant room given for building reserve capacity for Group 2 drivers in the directives: for example, although monocular (vision in one eye) driving is considered an acceptable risk for Group 1 driving, it is not for Group 2, as any eventuality causing reduced or absent vision in the single functioning eye cannot be compensated for by the other eye, a determination supported by European case law¹.

Higher employer standards additional to those of NDLS

European and NDLS standards are also a minimum, and it has been a consistent feature of the RSA/NDLS guidelines on medical fitness to drive that entities providing services requiring Group 2 driving are entitled to specify more specific standards: *“Group 2 standards are minimum standards and do not preclude employers setting*

¹ Court of Justice of the European Union. Opinion of the Advocate General delivered on 18 July 2013. Case C-356/12 Wolfgang Glatzel v Freistaat Bayern

higher standards in terms of the demands of driving and other tasks encountered in the course of employment.”².

This principle is also noted in the European directive for transporting of dangerous goods³. For example, given issues of speed, vehicle, and environment, it would seem prudent to mandate levels of medical fitness to drive similar to and sometimes exceeding those for Group 2 drivers. For example, for emergency service vehicle drivers extra stipulations relating to specific service needs such as enhanced visual (colour blindness for traffic signals and alerts and contrast sensitivity) and auditory function (1).

There are also issues where enhancing safety also parallels measures to enhance public trust in operator safety in terms of medical fitness to drive. A key example of a medical condition is that of alcohol use disorders and starting with the first bus operator in Ireland to install alcohol ignition interlocks into its fleet in 2012⁴, many other bus and truck fleet operators have followed suit by adding this extra requirement for drivers to the basic European guidelines. Equally, random drug and alcohol testing is standard in companies such as Bus Eireann, above and beyond the stipulations outlined in the European directives for Group 2 drivers.

Issues for consideration by employers/entities in considering setting of higher standards for certain groups of Group 2 drivers.

In general, higher standards set by employers for certain classes of Group 2 vehicles will generally take due notice of the complexity of the task, specific risk factors, and are ideally guided by input from their occupational health resource, existing evidence, and expertise, as well as parallel guidelines and regulations relating to aspects such as health and safety. In general, fleet operators will provide a higher level of standard setting than self-employed drivers reflecting both corporate responsibility as well as the lack of access to occupational health support for self-employed workers in general (2). Fleet settings are also more likely to generate a positive safety climate, a protective factor in school bus safety (3).

Legal opinion in European jurisdictions appears to accept that the occupational physician is in a different position from the clinician, whose primary duty is to the patient. The occupational physician must also consider the interests of the employer, the fellow employees, service users and the general public. This is particularly relevant where there are safety issues (4).

² Road Safety Authority. Sláinte agus Tiomáint. Ballina, Road Safety Authority, 2022, p9.

³ Directive 2008/68/EC of the European Parliament and of the Council of 24 September 2008

⁴ <https://www.siliconrepublic.com/innovation/bus-firm-innovates-with-alcohol-tracking-device-for-drivers>

Employers also need to recognise that medical certification of fitness in Ireland is currently by way of self-report and usually generalist medical review other than for a few specific conditions and may not cover elements relevant to the task needs of certain types of transport. In addition, a significant minority of bus drivers under-report relevant medical conditions (5).

The following elements arising from the evidence base of traffic medicine and psychology may be useful in considering what standards to apply for drivers of school buses.

1. Age and driving

The study of driving Group 1 vehicles and age has evolved over the last thirty years. At the younger end of the age scale, youth and inexperience have been identified as key risk factors for crash causation, and provide a background evidence-based support to the data showing increased crash risk for younger bus drivers in jurisdictions where this is permitted, and support maintaining the lower age-limit of the European directive for Group 2 drivers, given increased crash-risk for drivers younger than this when permitted to drive Group 2 vehicles in jurisdictions outside of the European Union.

There is a relatively modest body of research on school bus drivers. In general, school bus crashes occur at lower rates than most other forms of transport (6) but can be enormously traumatic when they occur. Driver error is the most prevalent cause of school bus crashes (7). It is clear that crash risk is elevated at both ends of the age-spectrum: in one major study, the crash was increased by 40% for the under 25 drivers, and 350% for drivers over 65 (8). This is against a background of increased crash risk for younger and older professional drivers for all forms of professional driving (9, 10).

2. Morbidity and illness risk factors

It is also worth noting that morbidity and illness risk factors are elevated in bus drivers to a greater extent than the general population (11), and that this should be borne in mind with regard to both morbidity and multi-morbidity increasing significantly in the general over-65 population in Ireland, with the presence of 3 or more conditions more than doubling from the 45-64 age-group to the 70-74 age-group (12). In addition, polypharmacy (defined as the regular use of five or more medicines (excluding food supplements and alternative medications) almost triples in incidence between age 50-64 and age 65-75 from 9-26%, with a further increase at age 75+ to 38% in men (13). This of relevance in terms of the association between polypharmacy and elevated crash risk (14) as well as manoeuvres such as hard-braking (15).

3. *Circumscription of compensatory strategies of older drivers*

There is accumulating evidence that use of compensatory strategic and tactical compensation is the key factor in an excellent safety record for older Group 1 drivers despite increasing levels of multi-morbidity (16). This has been a factor in the raising of the age for mandatory medical recertification for Group 1 drivers in Ireland from 70 to 75. However, the inherent flexibility in the strategies that older drivers use to reduce crash risk, for example, avoiding rush hour, bad weather, taking more simple routes (17) cannot be assured in a setting where routine early morning winter and afternoon trips would be required for school bus operation.

4. *Distracted Driving*

Over the past 25 years, distracted driving and driver inattention have been one of the main risk factors for road traffic collisions worldwide. Distraction is defined as “the diversion of attention away from activities critical for safe driving toward a competing activity”. A study of public buses indicated a 39 percent prevalence of distraction, the most prevalent due to interactions with another passenger. Distractions were more prevalent among drivers <30 years of age or ≥50 years of age, on city streets or highways (relative to residential streets), and when there were more than 20 passengers. Distractions were the least prevalent in suburban areas, with the highest prevalence observed in city centres and rural areas (18). While visual distraction is generally the predominant form of distraction, auditory can also be important, such as talk or noise from passengers, and relates to hazard perception. A systematic review of studies of hazard perception and age found diminished hazard perception associated with increasing age in the majority of studies (19).

Rowdiness, excessive noise and violence on school buses in international studies have been shown to interfere with bus driver concentration (20) and safety manoeuvres (3). A survey in the USA of school bus drivers found that noise outbursts (61%), out-of-seat activity (48%) and ‘roughhousing’ (31%) were among the most distracting pupil behaviours (21). A large study in Israel found similar frequencies of distracting behaviours (22). A further area of potential draw on attention and safety management is school bus transport for children with neurodevelopmental disorders (23).

Summary

It is a long-standing principle of the framework of medical fitness to drive that employers should view the regulations for medical fitness to drive arising from European directives as a minimum standard. Additional higher standards can be applied by employers to ensure due safety taking account of the nature and purpose of the tasks carried out by drivers they employ. The carriage of multiple passengers in

buses magnifies the potential for injury and death in crashes and generally higher standards are applied than the minimum Group 2 regulations. There are specific sensitivities in the carriage of groups of children, for instance in school buses. There are theoretical reasons supported by empirical evidence which suggest more caution should be exercised when considering the requirements for drivers of school buses.

This includes evidence that:

- the risk of crashes rises markedly after the age of 65,
- there are increased levels of multiple illnesses and polypharmacy as drivers get older,
- that the compensatory measures used by older Group 1 drivers (e.g., adapting behaviour to balance their driving capability with the demands of the driving tasks) are not available due to the requirement for fixed times for school bus runs,
- and the challenges of managing the significant burden of distraction in the school bus environment.

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Timeline of Interactions Between the RSA and the Department Regarding Collision Data Protection Issues (2020–2023)

Summary Overview:

Date	Details
2020	- RSA became aware that Road Traffic Collision (RTC) data should be treated as personal data under GDPR. The RSA had concerns in relation to the legal basis to allow continued receipt and sharing of the collision data and therefore paused data sharing with LGMA and DoTSO. - RSA consulted with legal advisors and the Department on a legislative approach for compliant data sharing, developing MOUs for limited data sharing as an interim solution.
2021	- Engagement with key stakeholders including DoT to identify legislative pathway forward to enable sharing of the RTC data. - In December, Ministerial Direction under Section 8 of the Road Safety Authority Act 2006 was identified as a potential solution. - Road Safety Strategy (2021-2030) published. Collision data sharing identified as an action in the Strategy. - The Data Enabler Group (DEG) was formed to lead data-sharing initiatives.
2022	- RSA submitted a proposal for a Ministerial Direction under Section 8 of the RSA Act to the DoT. - DoT sought legal advice from the Attorney General. - Drafting of Ministerial Direction commenced. - In August legal advice from AG to DoT confirmed the feasibility of the Ministerial Direction. - For the remainder of 2022, RSA and DoT worked extensively on preparing consultation documents for engagement with the Data Protection Commissioner (DPC), including drafting a Data Protection Impact Assessment (DPIA). - In 2022, the resolution of collision data sharing became a central priority for the DEG group. - Stakeholder meetings were held to: - Review all legislative avenues to enable data sharing - agree (applying the principles of GDPR) the data fields that would be shared with stakeholders once the appropriate legal basis were in place - receive input on their purposes and functions for requiring the RTC data - agree on data-sharing roles and responsibilities. - Final list of fields to be shared with LA's was agreed December 2022. - DoT finalised and submitted the consultation pack to the DPC for review. - Initial feedback was received from the DPC in December.
2023	- In February, DoT and RSA held a consultation meeting with the DPC to address feedback on the Section 8 proposal. - Further engagement and responses from the DPC in May and June where DPC raised concerns regarding the proportionality of the

	data being shared between An Garda Síochána (AGS) prompting engagement with AGS to resolve issues. • Throughout the remainder of 2023 actions were taken by the RSA and DOT to address the feedback and concerns raised during the consultation. • AGS conducted an internal review of RTC data fields. This work concluded in September. • AGS analysis was shared with the RSA in October 2023, in advance of a series of bi-lateral workshops between AGS and RSA. The objective of the workshops was to review each of the 161 individual data fields in the collision data set and to establish the proportionality and justification for sharing specific elements of the collision data. This work involved extensive engagement with AGS over a period of six months to complete the review and finalise list of data fields to be shared and support development of materials to resolve outstanding queries from the DPC. • Several bi-lateral meetings took place between RSA and representatives from local authorities, DoT and other road safety organisations, to support the development of a revised Section 8 Ministerial Direction, updated DPIA and development of the pack for re-engagement with the DPC. • This activity extended into 2024.
2024 – to date	• In February legislative changes were identified as necessary for local authorities to receive RTC data. • DoT began engagement with LGMA to identify legislative pathway to amend the 1993 Roads Act. • Between January – April extensive collaboration across stakeholder organisations to finalise pack for re-engagement with DPC. • May the DoT commenced re-engagement with the DPC to consult on the legislative changes and proposed approach to enable end-to-end sharing of collision data. • Engagement with the Data Protection Commissioner was successfully concluded in June, resulting in the progression of legislation (S8 Ministerial Direction) that authorises the RSA to receive, process, and share RTC data. • Ongoing collaboration between DoT and LGMA focused on progressing the legislative amendments required to enable sharing of RTC data with local authorities. • A legislative pathway has been clearly identified, with the Roads Bill 2024 expected to proceed into the Oireachtas later this year. • RSA continue to engage with all stakeholder to finalise the operational aspects of data sharing to ensure efficient resumption of data sharing once the necessary legal basis is in place.

Public Accounts Committee

27 June 2024

No	Questions	Response
1	Information on the RSA's monitoring of seatbelt-wearing in recent years and the impact of RSA campaigns in relation to seatbelt-wearing, including trends in the rate of drivers and passengers wearing seatbelts, and the proportion of fatalities where the driver and/or passenger(s) were not wearing a seatbelt (pg. 10).	See table 1 below for historic rates of seat belt wearing from RSA observational surveys. See table 2 below for proportion of fatalities where the driver and/or passenger(s) were not wearing a seatbelt. The RSA's most recent seatbelt advert ran from mid-July until mid-August 2024 and will be tracked in terms of effectiveness by IPSOS in September. The RSA can share this report with PAC when it is received – expected in October/early November. The RSA can additionally request a briefing from IPSOS giving a cumulative perspective on seatbelt campaigns over a number of years, if members of PAC would consider this beneficial.
2	The amount of expenditure assigned by the RSA to campaigns that encourage modal shift (pg. 14).	In terms of advertising, the RSA has assigned budget to campaigns where the primary message is to promote road safety with an explicit focus on positively promoting the safe use of different modes of travelling. These include the new recent campaigns such as e-scooters, 30Km/h, and Who is Mary Ward? (Vision Zero). Significant budget is also assigned to campaigns that aim to ensure improved road safety outcomes for specific road user types and the safer use of some specific modes such as pedestrian safety tv-led advertising campaign, horse rider safety PR and digital campaign, safer over-taking of cyclists animated TV campaign and the cycle safety campaign with Imogen Cotter. In 2023, the RSA spent the following on these campaigns: • E-scooter campaign €228,261.46 • 30Km/h Campaign €64,154.69 • Vision Zero €645,645.56. • Pedestrian Safety €218,201.06 • Horse and rider safety €10,648



		• Animated safety over taking of cyclists €184,246.11 • Cycle safety with Imogen Cotter €61,336.66 To June 2024, the RSA has spent the following on these campaigns: • E-scooter campaign €368,106.78 • 30Km/h Campaign €325,203.25 • Vision Zero €417,159 • Pedestrian Safety €227,642.28 • Cycle safety with Imogen Cotter €391,483.50 All figures are exclusive of 23% vat. In terms of education to support the improved road safety of road user groups: In 2023: • RSA Contribution of €200,000 to Cycling Right Training in primary schools (co-funded). • Promotion of safe cycling and safe walking through the RSA's StreetSmart programme which goes into primary schools and teaches through role-play – €279,412.02. • Promotion of safety cycling through the RSA Interactive Shuttle which includes using the cycling simulator developed for the RSA using rules of the road - €643,386.01. • Purchase of bike lights for distribution at events nationally and during bike week – €27,675.00. In 2024 up to end of June • RSA Contribution of €200,000 to Cycling Right Training in primary schools (co-funded).
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		- Promotion of safe cycling and safe walking through the RSA's StreetSmart programme which goes into primary schools and teaches through role play – €167,026.70 up to end June. - Promotion of safety cycling through the RSA Interactive Shuttle which includes using the cycling simulator developed for the RSA using rules of the road – €316,928.44 up to end June. In September, Minister Foley and Minister Lawless will launch the RSA's new Transition Year programme, which includes a specific focus on safe road use across various modes of travel. Following an audit of key education services in early 2024, the RSA will bring a four year education plan to its board in October 2024 which includes as a key objective ensuring ongoing update on content, initiatives and interventions in relation to all modes of transport. The RSA supports the Department of Transport as lead agency in creating awareness campaign supporting modal shift, in particular the Your Journey Counts campaign which the RSA collaborated on and also continues to share when it is live.
3	A copy of the PhD presentation that the RSA had in recent weeks and any other research has undertaken or commissioned on the role of high visibility materials in road safety, and any cost benefit analysis undertaken by the RSA in this regard (pg. 16).	A copy of the RSA-funded PhD can be found at this link . Observational studies on the prevalence of high-visibility clothing wearing by motorcyclists and pedal cyclists are commissioned by the RSA and conducted regularly. Results from the 2023 and 2021 studies, for example, can be found at this link .
4	A copy of Professor Desmond O'Neill's medical advice, in relation to school bus drivers over the age of 70 (pgs. 21, 46, 61).	Document attached for review.
5	Details of the legislation on drivers of commercial vehicles, including the age	A person driving a Group 2 category vehicle must be certified as medically fit at least every five years. Applicants over 75 years of age can only be certified as being fit to drive for either one or three years, this is dictated by the medical practitioner's



	after which drivers require an annual medical (pg. 24).	examination on medical fitness of the driver. As defined by the Road Traffic (Licensing of Drivers) regulations 2006 and the 2022 amended regulations
6	The number of road collisions annually in recent years, compared with the number of road fatalities each year (pg. 37).	See table 3 below for number of fatalities and the number of fatal collisions between 2005-2023.
7	A note on the review of road traffic collision data fields, what data fields are reported in the case of a road collision and any proposed changes to these, what the GDPR issues are, and how the information can be anonymised to better understand the driver's movements in a collision, particularly in asymmetric collisions (pg. 38)	It is currently the case that the RSA uses the available information in the collision database to report on the circumstances of the collision, in particular the manoeuvres of drivers involved in collisions with other road users. By way of example, the 'spotlight reports' published by the RSA (motorcyclist, cyclist, pedestrian) contain information about the action of the user and the other vehicle/ road user involved. These reports are published on www.RSA.ie : Cyclist spotlight report: fatalities and serious injuries 2018-2022 accessible here (slide 19): https://www.rsa.ie/docs/default-source/road-safety/r2---statistics/analysis-of-road-users/cyclist-spotlight-report-fatalities-and-serious-injuries-2018-2022.pdf?Status=Master&sfvrsn=5489d721_3 Motorcyclist spotlight report: fatalities and serious injuries 2019-2023 accessible here (slide 16 and 17): https://www.rsa.ie/docs/default-source/road-safety/r2---statistics/analysis-of-road-users/motorcyclist-spotlight-report-fatalities-and-serious-injuries-2019-2023.pdf?sfvrsn=d3d27556_5 Pedestrian spotlight report: fatalities and serious injuries 2018-2022 accessible here (slide 18): https://www.rsa.ie/docs/default-source/road-safety/r2---statistics/analysis-of-road-users/pedestrian-spotlight-report-fatalities-and-serious-injuries-2018-202268b18e0d-4878-4952-8f7f-43c68fee24d9.pdf?sfvrsn=39b28c39_5 The RSA's road traffic collision database is based on records transferred from An Garda Síochána (AGS) to the RSA. Only Traffic Collision Incidents are in scope for transfer, and the database is broadly structured into three parts: location details (e.g., the x and y coordinates, road type, and route type of the collision site),



		• vehicle details (e.g., the class of the vehicle, vehicle action, number of vehicles involved in the collision), and • person details (e.g., the role, gender and age of the person involved in the collision). Three variables in particular describe the circumstances of a collision. These are: • Driver Actions (e.g., Failed to stop or yield, exceeded safe speed, drove through traffic signal) • Vehicle Actions (e.g., Entering/Exiting, Turning Right, Turning Left), and • Primary Collision Type (e.g., Pedestrian, Cyclist, Head-On). As part of a collective review involving the RSA and AGS, the full list of variables that have been shared with the RSA up until now were assessed from the perspective of necessity and proportionality in the context of the General Data Protection Regulation (GDPR). As part of this review, it was agreed that certain variables would no longer be transferred by AGS to the RSA. The reason for no longer transferring these fields is either because they are not required by the RSA to carry out its functions or because they are free-text and, therefore, may contain personal data. The RSA currently still receives the full list of variables, but a technical project has commenced in collaboration with AGS to implement the required changes to the data transfer, agreed in the context of GDPR. Once this project is implemented the variables received in the future will only be ones that are required by the RSA or are systematic in nature, i.e., not free text.
8	A timeline of interactions between the RSA and the Department from the time that data protection issues around collision data came to light to the issues being resolved (pg. 39),	Document attached for review.
9	The number of HGV testers employed by the RSA, and their locations (pgs. 47, 56).	There are 69 driver testers currently employed by the Road Safety Authority who have the requisite skills and training to conduct a HGV test in Ireland.
10	The locations of the driver test centres in Co. Laois, and their addresses (pg. 51).	The driving test centre in Laois is located at:



		Government Offices, Abbeylax Road, Abbeylax, Portlaoise, Co. Laois R32 RPA6 The following test categories can be taken at this centre: 
11	The RSA's expenditure on the use of hotels as driving test centres, the number of hotels used, and their locations (pg. 51).	In 2023, €440,352 was spent on 8 Hotels used as temporary driving test centres, while the RSA works to secure more permanent locations. Below is the list of these 8 hotels and their locations: - Talbot Hotel, Portlaoise Road, Carlow. - Cavan Crystal Hotel, Dublin Road, Cavan - Clonmel Park Hotel, Poppyfield, Clonmel, Tipperary - Osprey Hotel & Spa, Devoy Quarter, Naas, Kildare - Tracy's Oakwood Hotel, Airport Road, Shannon, Clare - Longcourt Hotel, St Mary's Road, Newcastlewest, Co Limerick. - Rochestown Lodge Hotel, 164 Rochestown Ave, Dún Laoghaire, Dublin. - Station House Hotel, Clifden, Co Galway -
12	The number of driving test centres between Graiguecullen and Carlow town and their locations (pg. 51).	There are currently two test centres operational in Co. Carlow at the addresses set out below: Graiguecullen Driving Test Centre Church Street (Beside Inver Filling Station), Graiguecullen, Carlow.R93 T3H1. This centre conducts Category B (Car) tests only. And Carlow Talbot Hotel, Graigue, Portlaoise Road, Carlow.R93 Y504 The following test categories can be taken at this centre:



		
13	An update on the implementation of phase 1 of the RSA's road safety strategy (pg. 52).	The Government's Road Safety Strategy 2021-2030 was launched in December 2021. This Strategy has set ambitious targets for reductions in deaths and serious injuries on Irish roads by 2030 and 2050. Within the period of the current Strategy, the primary aim is to halve deaths and serious injuries on Irish roads this decade. In the longer term, the Strategy aims to bring Ireland closer to achieving Vision Zero by 2050, which is the aspiration to move as close as possible to zero deaths or serious injuries. Vision Zero has been adopted as a road safety policy objective at both the national and European level. The Strategy is divided into three distinct delivery phases, each supported by its own Action Plan. Actions are implemented across a wide range of organisations, each of which has a road safety or crash response purview. The RSA is responsible for coordinating the development and implementation of the Strategy. Oversight of the strategy is provided by the Road Safety Transformation Partnership Board (comprising senior officials from the lead partner organisations). The Road Safety Transformation Programme in the RSA coordinates the development and delivery of the strategy Action Plans, including monitoring and reporting on how actions and safety performance indicators are progressing. Phase 1, which runs from 2021 to 2024, is now nearing completion and activities are underway to prepare a new Action Plan for Phase 2, which will run from 2025 to 2027. In April 2024 RSA commenced the review of effectiveness of the Road Safety Strategy Phase 1 Action Plan (2021- 2024) to evaluate the effectiveness and develop the Phase 2 Action plan (2025- 2027) with a survey issued to all partner agencies. A project plan has been agreed with extensive stakeholder engagement. international best practice studies, 1 to 1 interview, Road Safety User forum etc.



		To date 42 of 190 Actions in the Phase 1 Action plan are complete, 12 actions have been deferred/ not started as some actions are dependent on outputs of other actions to allow them commence. We are currently working with our external partners to identify new actions and phase 1 actions that will continue into phase 2. The RSS phase 1 review and phase 2 action plan is scheduled to be finalised by Q1 2025.
14	A note on the €957,000 spent by the RSA in legal fees in 2022, including a breakdown of the areas in which the RSA needed external legal advice (pgs. 55-56).	As noted in the 2022 annual report the €957,466 is further broken into legal advice €607,208 and legal costs for court representation in legal cases of €350,204. Legal Advice (€607,208): As the RSA legal division consists of one in-house solicitor, there is heavy reliance on external legal advice. In 2022 legal advice was sought in the following areas: - Advice regarding the the relet of the new contract of provision of the Commercial Vehicle Information System. - Defence of judicial review proceedings and equal status cases in the WRC. - Advice regarding contractual arrangements with the RSA large, outsourced service providers including NCT, CVRT, NDLS and DTT. - Advice on legislative and SI drafting for items including e-scooters, EU Regulation 2021/535 Spary suppression system, EU Regulation 2019/2144 Vehicle general safety type approval - Advice regarding the area of Vehicle standards including automotive market surveillance authority, On Board Fuel Consumption meter, Modernisation of CEU - Other adhoc queries relating to procurement, data projection and employment advice. Court representation (€350,204): As part of the RSA role of enforcing commercial operators and drivers, the RSA enforcement team undertake roadside and premises inspections. These inspections lead to prosecutions which incurred €350k of the legal fees in 2022 related to the legal costs of court representation in these proceedings.



15	The average cost of a roadside checkpoint to the RSA (pg. 57).	The Average cost of roadside check is €3,300																																																																																																																														
16	A note on staff structure and a breakdown of the numbers across the different staff bands within the RSA from 2020 to 2024 (June 2024) (pg. 59).	<table><thead><tr><th></th><th>2020</th><th>2021</th><th>2022</th><th>2023</th><th>2024</th></tr></thead><tbody><tr><td>CEO</td><td>1</td><td>1</td><td>1</td><td>1</td><td>1</td></tr><tr><td>PRINCIPAL OFFICER</td><td>6</td><td>4</td><td>7</td><td>7</td><td>7</td></tr><tr><td>PRINCIPAL ENGINEER</td><td>1</td><td>1</td><td>1</td><td>1</td><td>1</td></tr><tr><td>AP</td><td>28</td><td>24.6</td><td>24.2</td><td>29.2</td><td>25.2</td></tr><tr><td>HEO</td><td>41.4</td><td>46</td><td>51.5</td><td>50.2</td><td>49.3</td></tr><tr><td>AO</td><td>1</td><td>1</td><td>1</td><td>1</td><td>1</td></tr><tr><td>EO</td><td>36.32</td><td>35.97</td><td>38.33</td><td>37.63</td><td>41.63</td></tr><tr><td>CLERICAL OFFICER</td><td>78.13</td><td>68.43</td><td>86.17</td><td>83.56</td><td>89.07</td></tr><tr><td>TRANSPORT OFFICER (INCL SR TRANSPORT OFFICER)</td><td>20</td><td>21</td><td>19</td><td>19.6</td><td>19.6</td></tr><tr><td>VEHICLE INSPECTOR (INCL SR VEHICLE INSPECTOR)</td><td>19.8</td><td>25.2</td><td>24</td><td>23</td><td>22.8</td></tr><tr><td>ADI EXAMINER/SUPERVISOR</td><td>4</td><td>4</td><td>4</td><td>4</td><td>4</td></tr><tr><td>CHIEF DRIVER TESTER</td><td>1</td><td>1</td><td>1</td><td>1</td><td>1</td></tr><tr><td>REGIONAL MANAGEMENT</td><td>3</td><td>3</td><td>3</td><td>3</td><td>3</td></tr><tr><td>AREA SUPERINTENDENT</td><td>1</td><td>1</td><td>1</td><td>1</td><td>1</td></tr><tr><td>DRIVER TESTER</td><td>174</td><td>165.3</td><td>141.7</td><td>177.5</td><td>162.15</td></tr><tr><td>DRIVER TESTER SUPERVISOR</td><td>8</td><td>8</td><td>9</td><td>8</td><td>7</td></tr><tr><td>TECHNICAL EO (ESDS)</td><td>1</td><td>1</td><td>1</td><td>1</td><td>1</td></tr><tr><td>SERVICE OFFICER</td><td>3</td><td>3</td><td>3</td><td>2</td><td>2</td></tr><tr><td>ENGINEERS</td><td>5</td><td>5</td><td>5</td><td>6</td><td>6</td></tr><tr><td></td><td>432.65</td><td>419.5</td><td>421.9</td><td>456.69</td><td>445.1</td></tr></tbody></table>		2020	2021	2022	2023	2024	CEO	1	1	1	1	1	PRINCIPAL OFFICER	6	4	7	7	7	PRINCIPAL ENGINEER	1	1	1	1	1	AP	28	24.6	24.2	29.2	25.2	HEO	41.4	46	51.5	50.2	49.3	AO	1	1	1	1	1	EO	36.32	35.97	38.33	37.63	41.63	CLERICAL OFFICER	78.13	68.43	86.17	83.56	89.07	TRANSPORT OFFICER (INCL SR TRANSPORT OFFICER)	20	21	19	19.6	19.6	VEHICLE INSPECTOR (INCL SR VEHICLE INSPECTOR)	19.8	25.2	24	23	22.8	ADI EXAMINER/SUPERVISOR	4	4	4	4	4	CHIEF DRIVER TESTER	1	1	1	1	1	REGIONAL MANAGEMENT	3	3	3	3	3	AREA SUPERINTENDENT	1	1	1	1	1	DRIVER TESTER	174	165.3	141.7	177.5	162.15	DRIVER TESTER SUPERVISOR	8	8	9	8	7	TECHNICAL EO (ESDS)	1	1	1	1	1	SERVICE OFFICER	3	3	3	2	2	ENGINEERS	5	5	5	6	6		432.65	419.5	421.9	456.69	445.1
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Supplementary tables

Table 1 Historic seat belt wearing rates by vehicle occupant based on RSA observational studies, 2006-2023

Year	Drivers	Front Passengers	Rear Passengers
2006	*86%		63%
2007	*88%		84%
2008	90%	90%	78%
2009	90%	89%	79%
2011	94%	94%	90%
2012	93%	90%	89%
2013	94%	93%	89%
2014	92%	93%	88%
2015	94%	94%	81%
2016	92%	94%	74%
2017	96%	96%	83%
2018	94%	95%	89%
2021	99%	98%	93%
2022	99%	99%	93%
2023	95%	94%	95%

*In the 2006 and 2007 studies, percentages for drivers and front passengers were expressed in terms of front seat occupants



Table 2 Fatally injured car users (drivers and passengers) by seat belt status, 2019-2023

Year	Seat belt status		
	No	Unknown	Yes
2019	28%	10%	62%
2020	26%	20%	54%
2021	26%	25%	49%
2022	18%	24%	58%
2023	11%	47%	42%
Total	22%	26%	53%

Figures for 2020 onwards are provisional and subject to change.

Table 3 Fatalities and fatal collisions between 2005-2023

Information	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Total fatalities	396	365	338	279	238	212	186	163	188	192	162	182	154	134	140	144	133	154	184
Total fatal collisions	360	321	309	254	220	185	172	152	179	178	155	171	139	127	129	133	121	148	173

Figures for 2020 onwards are provisional and subject to change.

